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August 1, 2025

**VIA ECF**

Hon. Sanket J. Bulsara  
United States District Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Fischer, et al. v. Government Employees Insurance Company*  
Case No. 2:23-CV-02848 (SJB) (SLT)

Dear Judge Bulsara:

The parties write jointly to request a modest enlargement of the word count for each party's briefing on Defendant's Motion for Summary Judgment, set to be filed as a bundled motion on October 10, 2025. Pursuant to Rule VI.E of this Court's Individual Practices, the word limit for memoranda of law in support or opposition of motions is 8,750 words, and 3,500 words for any reply. *See* Judge Bulsara Individual Practices (Civil) (April 21, 2025). The parties request leave for an additional 2,000 words for both memoranda of law in support and opposition to the motion (10,750 words each), and an additional 800 words for Defendant's reply (4,300 words total).

Good cause exists to support the parties' request. In Defendant's Motion for Summary Judgment, Defendant asserts multiple bases for summary judgment as to several parties and must explain the applicability of each basis. Further, the record in this case is voluminous, and includes responses to written discovery, several thousand documents, and extensive deposition testimony. The increased word limit is necessary to completely present the factual record and the applicable law to the Court and to reflect the applicable record and legal citations.

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Accordingly, the parties respectfully request that the Court permit the parties to file opening and response briefs containing no more than 10,750 words, and Defendant to file a reply brief of no more than 4,300 words.

Respectfully submitted,

DUANE MORRIS LLP



Gerald L. Maatman, Jr.  
Partner

GLM

cc: All Counsel of Record (via ECF)